

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION  
CASE NO. 25-22652-CV-WILLIAMS**

ALEJANDRO MOSQUEDA PAZ  
p/k/a “ALMIGHTY,”

Plaintiff,

v.

PRIMO BOYZ RECORDS LLC, a/k/a  
PRIMO BOYS RE L.L.C., PRIMO BOYZ  
MUSIC PUBLISHING L.L.C., and JOSE  
POLANCO,

Defendants.

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**JOINT MOTION FOR AMENDMENT OF SCHEDULING ORDER**

Plaintiff, ALEJANDRO MOSQUEDA PAZ (“Plaintiff”), and Defendants PRIMO BOYZ RECORDS LLC, ET AL. (“Defendants”)(collectively “Parties”) by and through undersigned counsel and pursuant to Federal Rules of Civil Procedure, the Local Rules, jointly move for a limited modification of the Scheduling Order entered on the Court’s docket at ECF 22 (“Scheduling Order”). The modification is partial because it does not affect the trial date or the calendar call.

The Parties are still actively working on advancing discovery and are in need of additional time to be compliant with the Scheduling Order. Consequently, the Parties respectfully request additional time to complete certain deadlines for this case, including discovery.

Despite seeking the extension of the below referenced deadlines, the parties are not requesting that the trial date or calendar call be modified. Pursuant to Federal Rule of Civil Procedure 16(b)(4), a scheduling order may be modified only for good cause and with the judge’s

consent. Good cause exists here because the Parties have been working diligently and in good faith to complete discovery, the additional time will enable the Parties to obtain, analyze, and disclose expert opinions that are integral to the claims and defenses in this case, no party will be prejudiced by the requested extension.

The requested modification does not affect the trial setting or any dispositive motion deadlines. This is the Parties' first joint request for modification of the Scheduling Order, and it is not made for purposes of delay. Therefore, for the above reasons, the parties submit that good cause exists under Fed. R. Civ. P. 6(b) for the modification of the Scheduling Order and the parties submit that it be modified as follows:

From January 20, 2026 to February 13, 2026 – The Plaintiff shall disclose experts, expert witness summaries and reports.

From February 3, 2026 to February 27, 2026 – The Defendant shall disclose experts, expert witness summaries and reports.

From February 17, 2026 to March 13, 2026 – The Parties shall exchange rebuttal expert witness summaries and reports.

From March 9, 2026 to March 30, 2026 – The Parties shall complete all discovery, including expert discovery.

**WHEREFORE**, the Parties respectfully request this Court to grant the extension of time requested herein.

**CERTIFICATE OF GOOD FAITH CONFERRAL**

Pursuant to the Local Rules, undersigned counsel conferred with all counsel of record who joined in this motion and agreed to the relief sought.

Respectfully submitted,

By: <u>s/ Humberto Rubio</u> Humberto Rubio, Jr., Esq. Florida Bar No. 36433	By: <u>s/ Patrick G. Dempsey</u> Patrick G. Dempsey Florida Bar No. 027676
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<p>Felipe Rubio, Esq. Florida Bar No. 123059 <b>LAW FIRM OF RUBIO &amp; ASSOCIATES, P.A.</b> Attorneys for Plaintiff 8950 SW 74 Ct., Suite 1804 Miami, Fl 33156 Telephone: (786) 220-2061 Facsimile: (786) 220-2062 Email: hrubio@rubiolegal.com Email: frubio@rubiolegal.com Email: info@rubiolegal.com</p> <p><i>Attorneys for Plaintiff</i></p>	<p><b>Hirzel Dreyfuss &amp; Dempsey PLLC</b> <b>1200 Anastasia Ave., Suite 240</b> Coral Gables, Florida 33134 Email: dempsey@hddlawfirm.com Ph: (305) 615-1617</p> <p><i>Attorney for Defendants</i></p>
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 16<sup>th</sup> day of January, 2026, caused to be served a true and correct copy of the foregoing using CM/ECF, which served a true and correct copy to all counsel or parties of record on the Service List as well as pursuant to this Court's prior orders.

By: /s/ Humberto Rubio  
Humberto Rubio, Jr., Esq.  
Florida Bar No. 36433